

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:)
THE FINANCIAL OVERSIGHT AND) PROMESA
MANAGEMENT BOARD FOR PUERTO RICO) Title III
as representative of) Case No. 17-BK-03283 (LTS)
THE COMMONWEALTH OF PUERTO RICO, *et al.*,) (Jointly Administered)
Debtors.¹) **Re: ECF No. 18447**
)
)

**RESERVATION OF RIGHTS OF THE OFFICIAL COMMITTEE OF RETIRED
EMPLOYEES WITH RESPECT TO INITIAL PROPOSED CONFIRMATION ORDER**

To the Honorable United States District Judge Laura Taylor Swain:

In connection with the proposed *Order and Judgment Confirming Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Dkt. 18447] (the “**Proposed Confirmation Order**”), the Official Committee of Retired Employees (the “**Retiree Committee**”), hereby submits this reservation of rights and states:

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. On October 8, 2021, the Oversight Board filed the Proposed Confirmation Order in connection with the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* (Dkt. 17627, as amended, the “**Plan**”).

2. The Retiree Committee is a party to Plan Support Agreement with the Oversight Board. Pursuant to the Plan Support Agreement, the Plan and the Proposed Confirmation Order must be “consistent” with the terms of the Plan Support Agreement.

3. The Retiree Committee has provided the Oversight Board with certain comments on and proposed revisions to the Proposed Confirmation Order in accordance with the Plan Support Agreement. The Retiree Committee anticipates that its comments and revisions will be resolved by the parties in advance of the Confirmation Hearing. In the meantime, however, the Retiree Committee reserves all of its rights with respect to the Proposed Confirmation Order, including the Retiree Committee’s right to address any unresolved issues in connection with the Proposed Confirmation Order at the confirmation hearing.

(Signature page follows.)

Dated: October 22, 2021

JENNER & BLOCK LLP

By:

/s/ Robert Gordon

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